

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

*Plaintiffs,*

v.

TEXAS, et al.,

*Defendants.*

Civil Action No. 5:21-cv-844(XR)  
(Consolidated Case)

OCA-GREATER HOUSTON, LEAGUE  
OF WOMEN VOTERS OF TEXAS,  
REVUP-TEXAS, and  
WORKERS DEFENSE ACTION FUND,

*Plaintiffs,*

v.

TEXAS SECRETARY OF STATE JANE  
NELSON, *in her official capacity*, TEXAS  
ATTORNEY GENERAL KEN  
PAXTON, *in his official capacity*,  
HARRIS COUNTY ELECTIONS  
ADMINISTRATOR CLIFFORD TATUM, *in his  
official capacity*,  
TRAVIS COUNTY CLERK DYANA LIMON-  
MERCADO, *in her official capacity*, HARRIS  
COUNTY DISTRICT ATTORNEY KIM OGG, *in  
her official capacity*, TRAVIS COUNTY  
DISTRICT ATTORNEY JOSÉ GARZA, *in his  
official capacity*,

*Defendants.*

1:21-cv-0780-XR

**UNOPPOSED MOTION TO WITHDRAW WORKERS DEFENSE ACTION FUND**

Pursuant to Rule 21 of the Federal Rules of Civil Procedure, OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, and Workers Defense Action Fund (“OCA-GH Plaintiffs”) move for the withdrawal of Workers Defense Action Fund as a party in this action. All other OCA-GH Plaintiffs will remain in this litigation.

Counsel for the OCA-GH Plaintiffs have conferred with counsel for Defendants Garza and Limon-Mercado, Defendant Tatum, Defendant Ogg, the State Defendants, and the GOP Intervenor-Defendants, and all have indicated they do not oppose this motion. Accordingly, the OCA-GH Plaintiffs respectfully request that this Court enter an order voluntarily withdrawing Workers Defense Action Fund, with prejudice, from this litigation.

Dated: March 6, 2023.

Respectfully submitted,

/s/ Zachary Dolling

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\*admitted *pro hac vice*

**CERTIFICATE OF SERVICE**

By my signature below, I certify that a true and correct copy of the foregoing has been served on all counsel of record on March 6, 2023, through the Electronic Case File System of the Western District of Texas.

/s/ Zachary Dolling

**CERTIFICATE OF CONFERENCE**

I certify that between February 27, 2023, and March 4, 2023, the OCA-GH Plaintiffs' counsel conferred via e-mail with counsel for Defendant Garza, Defendant Limon-Mercado, Defendant Tatum, Defendant Ogg, the State Defendants, and the GOP Intervenor-Defendants, and each indicated they did not oppose this motion.

/s/ Zachary Dolling